

1 Joseph H. Harrington
2 United States Attorney
3 Eastern District of Washington
4 *Vanessa R. Waldref*
5 Assistant United States Attorneys
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

9
10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON

12 OSCAR RUIZ SIFUENTES,

13 Plaintiff,

14 vs.

15 UNITED STATES OF AMERICA,

16 Defendant.

Case No. 1:18-cv-03106-TOR

JOINT STIPULATED ORDER
REGARDING PRESERVATION OF
PRIVILEGE CLAIMS

17 The parties agree that the Court may and should adopt the below stipulated Order
18 as an order of the Court pursuant to Rule 16(b)(3)(B)(iv) of the Federal Rules of Civil
19 Procedure and that it may be enforceable as any other order of the Court.

20 1. The production of privileged or work-product protected documents,
21 electronically stored information (“ESI”) or information, whether inadvertent or
22 otherwise, is not a waiver of the privilege or protection from discovery in this case or
23 in any other federal or state proceeding. This Order shall be interpreted to provide the
24 maximum protection allowed by Federal Rule of Evidence 502(d).

25 2. Nothing contained herein is intended to or shall serve to limit a party’s right to
26 conduct a review of documents, ESI or information (including metadata) for relevance,
27 responsiveness and/or segregation of privileged and/or protected information before
28 production.

1 RESPECTFULLY SUBMITTED: October 15, 2018.

2
3 **AGREED TO:**

4 Joseph H. Harrington
United States Attorney


Law Offices of Mariano Morales

5 s/Vanessa R. Waldref
6 Vanessa R. Waldref
Assistant United States Attorneys
7 usawae.VWaldrefECF@usdoj.gov

s/James Boyer
James Boyer
Morales Law Office
1410 North 16th Ave
Yakima, WA 98902
8 james@mmoraleslawoffice.com

9
10 **SO ORDERED:**

11 DATED this 7th day of November, 2018.

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15 THE HONORABLE THOMAS O. RICE
16 CHIEF UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2018, I caused to be delivered via the method listed below the document to which this Certificate of Service is attached (plus any exhibits and/or attachments) to the following:

NAME & ADDRESS	Method of Delivery
James Boyer Morales Law Office 1410 North 16 th Ave Yakima, WA 98902 james@mmoraleslawoffice.com	<input checked="" type="checkbox"/> CM/ECF System <input type="checkbox"/> Electronic Mail <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Other: _____

s/Vanessa Waldref
Assistant United States Attorney